Documents

for

FOIA Request #EPA-R6-2014-000821

United States Environmental Protection Agency
Washington D.C. 20460

EPA NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
N	5AR0001210	120131	O	R	1

21 SIC CODE: 2421 66

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
		N	N	

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time/Date	Permit Effective Date
Georgia Pacific LLC **100 Mill Supply Road** **Crossett, AR**	**09:45 a.m. 01/31/2012**	**09/30/2010**
	Exit Time/Date **04:50 p.m. 02/01/2012**	Permit Expiration Date **10/31/2015**

Name(s) of On-Site Representatives	Title(s)	Phone Number
James Cutbirth	**Environmental Affairs Manager**	**870-567-8144**
Rachel Johnson	**Environmental Engineer**	**870-567-8170**

Name, Address of Responsible Official	Title	
James Cutbirth **Georgia-Pacific, LLC** **P.O. Box 3333** **Crossett, AR 71635**	**Environmental Affairs Manager**	
	Phone Number **870-567-8144**	Contacted: YES X NO ___

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	N	Storm Water	N	CSO/SSO
M	Records/Reports	M	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	S	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	U	Laboratory	U	Operations & Maintenance		

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

EXECUTIVE SUMMARY: The inspection report and ratings in Section C (Areas Evaluated During Inspection) are those of the state inspector. Refer to the attached state report for a summary of the findings in the areas evaluated during the inspection.

The Compliance Evaluation Inspection (CEI) was conducted by the State of Arkansas Department of Environmental Quality (ADEQ) Inspector John Lamb. All areas marked in Section C were adequately evaluated by the inspector and met the needs of the National Pollutant Discharge Elimination System (NPDES) Program.

RECEIVED
MAR 13 2012
6EN-W

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone	Date
David Lamb	**US EPA/6EN-AS/(214) 665-7323**	03/06/2012
Signature of Reviewer	Agency/Office **US EPA/6EN-AS**	Date

ADEQ

ARKANSAS
Department of Environmental Quality

February 27, 2012

Mr. James W. Cutbirth, Environmental Affairs Manager
Georgia Pacific, LLC
Crossett Operations
P.O. Box 3333
Crossett, AR 71635

RE: Compliance Inspection

AFIN: 02-00013, NPDES Permit No.: AR001210

Dear Mr. Cutbirth:

On January 31 and February 01, 2012, David Long, USEPA Region 6, Ronald Smith, ADEQ District 10 Water Inspector, and I performed a routine compliance inspection of the facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following:

1. **The facility contract lab (Test America) is not specifying which method in Standard Method is being used for Nitrate-Nitrogen analysis. This is a violation of Part III.C.3 of the permit.**

2. **The bar screen area had excessive solids on both sides of the ground. This area needed better housekeeping. This is a violation of Part III.B.1.a of the permit.**

3. **The last wing levee in the Aeration Stabilization Basin (ASB) had excessive erosion it. This is a violation of Part III.B.1.a of the permit.**

The above items require your immediate attention. Please submit a written response to these findings to Water Division Enforcement Branch. This response should be mailed to the address below, or e-mailed to Water-Enforcement-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentations (i.e. photos) is due by March 08, 2012.

It was also noted that the facility was not following the method as outlined in Standard Methods 2540 for TSS analysis. The facility was shaking and pouring the sample instead of using a stirrer and pipette according to the method. The facility stated that this is more representative way due to the nature of the effluent not being homogenous. The facility should contact Ms. Jane Hurley, ADEQ QA Officer, at 501-682-0938 for written approval for variance in the method.

For additional information you may contact the enforcement branch by telephone at 501-682-0639 or by fax at 501-682-0910.

If I can be of any assistance, please contact me at 870-862-0680.

Sincerely,

John W. Lamb

John W. Lamb
District 8 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch

EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type
1 N 2 5 3	A R 0 0 0 1 2 1 0 11	12 1 2 0 1 3 1 17	18 C	19 T	20 2

Remarks

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 69	70 2	71 N	72 N	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Georgia Pacific LLC **Crossett Operations** **100 Mill Supply Road** **Crossett, AR**	**09:45/01/31/2012**	**30 September 2010**
	Exit Time/Date **4:50/02/01/2012**	Permit Expiration Date **31 October 2015**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
James Cutbirth/Environmental Affairs Manager /870-567-8144 **Rachel Johnson, Environmental Engineer/ 870-567-8170**	
Name, Address of Responsible Official/Title/Phone and Fax Number **James Cutbirth, Environmental Affairs Manager /870-567-8144** **Georgia-Pacific, LLC** **P.O. Box 3333** **Crossett, AR 71635**	Contacted Yes ☑ No ☐

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	U	Operations & Maintenance	S	Sampling
M	Records/Reports	M	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	S	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	U	Laboratory	N	Storm Water		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

SEE PAGE 9 FOR FINDINGS/COMMENTS

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
John W. Lamb Ronald L. (Red) Smith	**AR Dept. of Environmental Quality,/El Dorado, Hope** **(870)862-0680 (870)862-3509 (870)777-7585**	**27 February 2012**
David Long	**U.S. EPA, Region 6, 1445 Ross Avenue** **Dallas, TX 75202 (214)665-7323**	
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

SECTION A: PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑Y ☐N ☐NA ☐NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	☐Y ☐N ☑NA ☐NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	☑Y ☐N ☐NA ☐NE
4. ALL DISCHARGES ARE PERMITTED:	☑Y ☐N ☐NA ☐NE

SECTION B: RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☐S ☑M ☐U ☐NA ☐NE
DETAILS: **see page 9**	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y ☐N ☐NA ☐NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	☐S ☑M ☐U ☐NA ☐NE
a. DATES AND TIME(S) OF SAMPLING:	☑Y ☐N ☐NA ☐NE
b. EXACT LOCATION(S) OF SAMPLING:	☑Y ☐N ☐NA ☐NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☑Y ☐N ☐NA ☐NE
d. ANALYTICAL METHODS AND TECHNIQUES:	☐Y ☑N ☐NA ☐NE
e. RESULTS OF CALIBRATIONS:	☑Y ☐N ☐NA ☐NE
f. RESULTS OF ANALYSES:	☑Y ☐N ☐NA ☐NE
g. DATES AND TIMES OF ANALYSES:	☑Y ☐N ☐NA ☐NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☑Y ☐N ☐NA ☐NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	☑S ☐M ☐U ☐NA ☐NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	☑S ☐M ☐U ☐NA ☐NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	☑Y ☐N ☐NA ☐NE

SECTION C: OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	☐S ☑M ☐U ☐NA ☐NE
DETAILS: **see page 9**	
1. TREATMENT UNITS PROPERLY OPERATED:	☑S ☐M ☐U ☐NA ☐NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	☐S ☑M ☐U ☐NA ☐NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	☑S ☐M ☐U ☐NA ☐NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	☑S ☐M ☐U ☐NA ☐NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	☑Y ☐N ☐NA ☐NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☑Y ☐N ☐NA ☐NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	☑Y ☐N ☐NA ☐NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	☐Y ☐N ☑NA ☐NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	☐Y ☐N ☑NA ☐NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	☐Y ☐N ☑NA ☐NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	☐Y ☑N ☐NA ☐NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	☐Y ☐N ☑NA ☐NE

SECTION D: SAMPLING

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y ☐N ☐NA ☐NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☑Y ☐N ☐NA ☐NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y ☐N ☐NA ☐NE
b. PROPER PRESERVATION TECHNIQUES USED:	☑Y ☐N ☐NA ☐NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y ☐N ☐NA ☐NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☑Y ☐N ☐NA ☐NE

SECTION E: FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:__ TYPE OF DEVICE: Parshall flume	☑Y ☐N ☐NA ☐NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y ☐N ☐NA ☐NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☑Y ☐N ☐NA ☐NE
4. CALIBRATION FREQUENCY ADEQUATE:	☑Y ☐N ☐NA ☐NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y ☐N ☐NA ☐NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☑Y ☐N ☐NA ☐NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y ☐N ☐NA ☐NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y ☐N ☐NA ☐NE
9. HEAD MEASURED AT PROPER LOCATION:	☑Y ☐N ☐NA ☐NE

SECTION F: LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☐S ☐M ☑U ☐NA ☐NE
DETAILS: see page 9	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	☐Y ☑N ☐NA ☐NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	☐Y ☑N ☐NA ☐NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	☑Y ☐N ☐NA ☐NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	☐Y ☑N ☐NA ☐NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
7. COMMERCIAL LABORATORY USED:	☑Y ☐N ☐NA ☐NE
a. LAB NAME: Test America/Environ/Environ/Analytical Perspectives	
b. LAB ADDRESS: Mobile Al/Brentwood Tn/Wilmington NC.	
c. PARAMETERS PERFORMED: chlorinated phenols, AOX, metals, nutrients, chloroform & pesticides, /Bio monitoring/Dioxin	
8. BIOMONITORING PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. PROPER ORGANISMS USED:	☑Y ☐N ☐NA ☐NE
b. PROPER DILUTION SERIES FOLLOWED:	☑Y ☐N ☐NA ☐NE
c. PROPER TEST METHODS AND DURATION:	☑Y ☐N ☐NA ☐NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☑Y ☐N ☐NA ☐NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY ☑S ☐M ☐U ☐NA ☐NE

DETAILS: See page 9

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	None	Mod	Trace	None	brown	
SMS	FLOODED						

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS ☑S ☐M ☐U ☐NA ☐NE

DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: ☑S ☐M ☐U ☐NA ☐NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: ☐S ☐M ☐U ☑NA ☐NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):

SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS ☐S ☐M ☐U ☑NA ☐NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION: ☐Y ☐N ☑NA ☐NE
2. TYPE OF SAMPLE: ☐GRAB:__ ☐COMPOSITE:__ METHOD:__ FREQUENCY:
3. SAMPLES PRESERVED: ☐Y ☐N ☑NA ☐NE
4. FLOW PROPORTIONED SAMPLES OBTAINED: ☐Y ☐N ☑NA ☐NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: ☐Y ☐N ☑NA ☐NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: ☐Y ☐N ☑NA ☐NE
7. SAMPLE SPLIT WITH PERMITTEE: ☐Y ☐N ☑NA ☐NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: ☐Y ☐N ☑NA ☐NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: ☐Y ☐N ☑NA ☐NE

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS ☑S ☐M ☐U ☐NA ☐NE

DETAILS: See page 9

1. SWPPP UPDATED AS NEEDED: ☑Y ☐N ☐NA ☐NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: ☑Y ☐N ☐NA ☐NE
3. POLLUTION PREVENTION TEAM IDENTIFIED: ☑Y ☐N ☐NA ☐NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: ☑Y ☐N ☐NA ☐NE
5. LIST OF POTENTIAL POLLUTANT SOURCES: ☑Y ☐N ☐NA ☐NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: ☑Y ☐N ☐NA ☐NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: ☑Y ☐N ☐NA ☐NE
8. LIST OF STRUCTURAL BMPS: ☑Y ☐N ☐NA ☐NE
9. LIST OF NON-STRUCTURAL BMPS: ☑Y ☐N ☐NA ☐NE
10. BMPS PROPERLY OPERATED AND MAINTAINED: ☑Y ☐N ☐NA ☐NE
11. INSPECTIONS CONDUCTED AS REQUIRED: ☑Y ☐N ☐NA ☐NE

FLOW CALCULATION SHEET

Date:	**31 Jan 2012**	Time:	**11:28**

Head in Inches:	**18.0"**	Feet:	**1.5'**

Type & Size of Primary Flow Measurement Device: 8 foot parshall flume

Name & Model of Secondary Flow Measurement Device: Milltronics OCM III

Date of last Calibration of Secondary Flow Device: 12/22/2011

Recorded Flow at Date & Time Listed Above: **38.25 mgd** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **39.68**

(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

$$\% \text{ Error} = \frac{\text{Recorded Value} - \text{Calculated Value}}{\text{Calculated Value}} \times 100$$

$$\% \text{ Error} = \frac{38.25 - 39.68}{39.68} \times 100$$

% Error = **3.6** %

Comments: **Less than 10 % error is acceptable.**

DMR Calculation Check

Reporting Period: From 2011 (Year) Dec (Month) 01 (Day) To 2011 (Year) Dec (Month) 31 (Day)

Parameter Checked: BOD

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly Daily Max. - mg/l
Reported Value:	7,982	24.1	30.5
Calculated Value:	7,982	24.1	30.5
Permit Value:	24,155.4	64.4	123.8

If calculated value does not equal reported value, explain:

equal

NPDES Compliance Inspection Report
Further Explanation

Section B: The facility has a BMP plan as required by the permit (Part II, item 9,). This plan was being implemented at the time of the inspection.

The facility has started implantation of a Mercury Pollutant Minimization Plan as required by the permit (Part II, 20 of the permit). The plan was started on September 01, 2011 and revised on November 08, 2011.

Section B, item 9: & Section F, item 1: The facility's contract lab (Test America) did not specify the method number from Standard Methods it was using for Nitrate-Nitrogen analysis. The lab simply stated it was from Standard Methods.

Section C, Item 2: The last wing levee in the Aeration Stabilization Basin (ASB) had excessive erosion on it. See photos 1 and 2.

The bar screen had excessive solids on the ground on both sides which needed to be cleaned up. See photos 3-5.

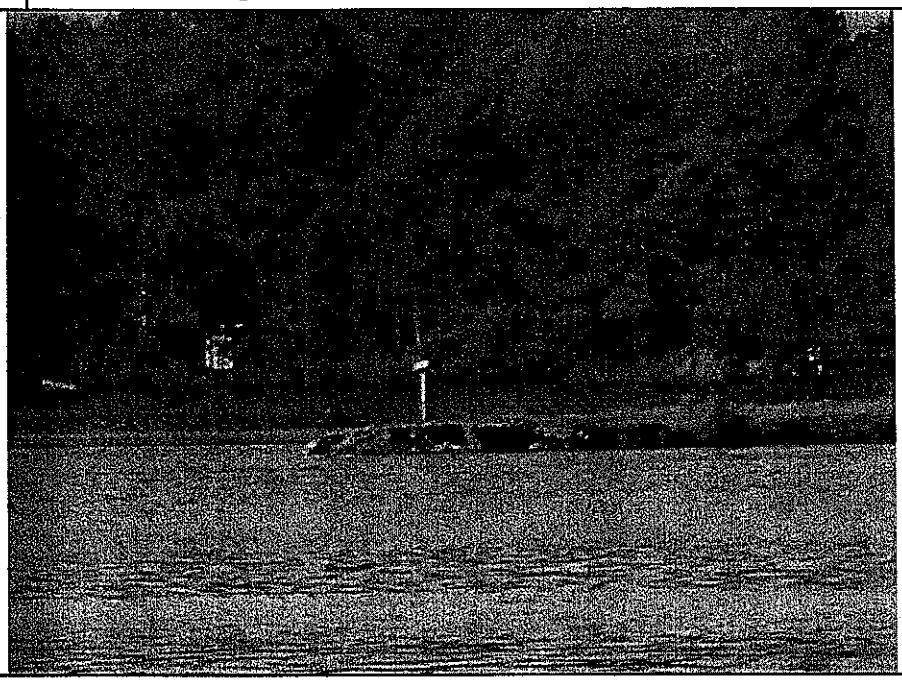
Section F, items 1 and 2: The facility was not following the method as outlined in Standard Methods 2540 for TSS analysis. They were shaking and pouring the sample instead of using a stirrer and pipette according to the method. The facility fills that this is more representative way due to the nature of the effluent not being homogenous. The facility should contact Ms. Jane Hurley, ADEQ QA Officer, for written approval for variance in the method.

Section F, item 4: The facility's laboratory S.O.P.s needed to be updated to showing exact procedures used, approval date and person approving the S.O.P's to reflect what is going on in the lab. For example, the lab procedures had the approval signature of a person that no longer worked at the facility. The facility should consider contacting Ms. Jane Hurley at ADEQ to help establish better OA/QC procedures for the lab.

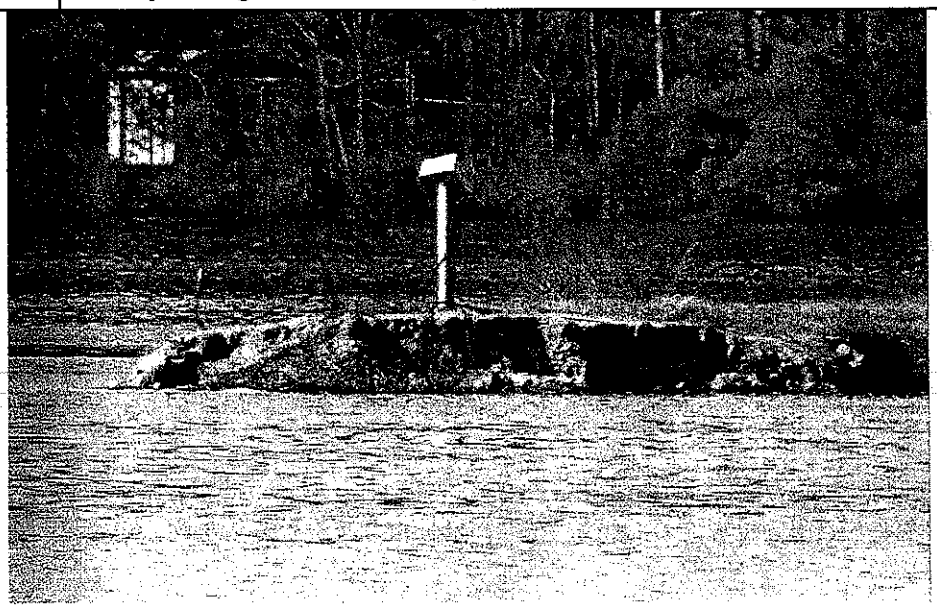
Section G: SMS 002 was not viewed or inspected due to being flooded by the Ouachita River at the time of the inspection. The river level was over 62 feet at Felsenthal Lock and Dam and as defined in the permit, Mossy Lake is considered flooded at a river stage of 62 feet or above and for two weeks following the river level falling below 62 feet.

Section J: A more in depth explanation of the facility's SWPPP, controls and etc. can be found in the inspection report for ARR00A776 conducted same date for the facility.

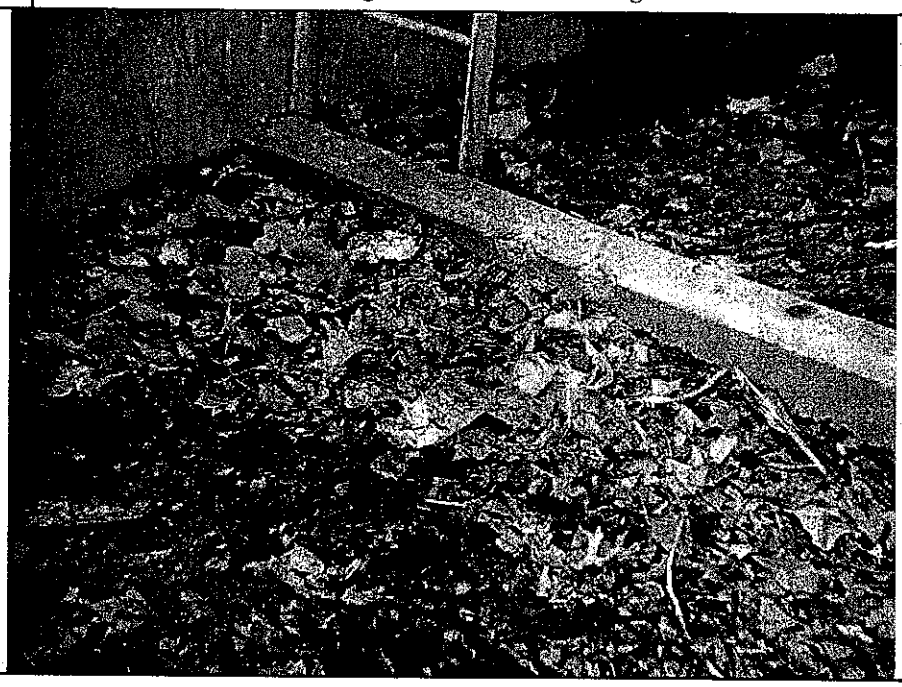
Water Division NPDES Photographic Evidence Sheet							
Location:	Georgia Pacific LLC, Crossett						
Photographer:	John Lamb			**Witness:**	Ronald Smith		
Photo #	1	**Of**	5	**Date:**	01/31/2012	**Time:**	11:55
Description:	Erosion of last wing dam in ASB						



Photographer:	Richard Freeman, G-P			**Witness:**	John Lamb		
Photo #	2	**Of**	5	**Date:**	01/31/2012	**Time:**	11:55
Description:	Close up of wing dam erosion taken by G-P camera						



Water Division NPDES Photographic Evidence Sheet							
Location:	Georgia Pacific LLC, Crossett						
Photographer:	John Lamb			**Witness:**	Ronald Smith		
Photo #	3	**Of**	5	**Date:**	01/31/2012	**Time:**	13:15
Description:	East side of bar screen showing excessive solids on the ground.						



Photographer:	John Lamb			**Witness:**	Ronald Smith		
Photo #	4	**Of**	5	**Date:**	01/31/2012	**Time:**	13:15
Description:	East side of bar screen at the dumpster hopper. Solids need to be cleaned up more						

Water Division NPDES Photographic Evidence Sheet								
Location:	Georgia Pacific LLC, Crossett							
Photographer:	John Lamb				**Witness:**	Ronald Smith		
Photo #	5	**Of**	5		**Date:**	01/31/2012	**Time:**	13:15
Description:	West side of bar screen, solids on the ground							

Photographer:					**Witness:**			
Photo #		**Of**			**Date:**		**Time:**	
Description:								

This slide left intentionally blank